

# ECKERT SEAMANS

Eckert Seamans Cherin & Mellot, LLC  
U.S. Steel Tower  
600 Grant Street, 44th Floor  
Pittsburgh, PA 15219

TEL 412 566 6000  
FAX 412 566 6099  
www.eckertseamans.com

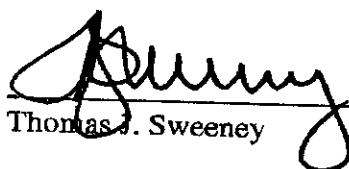
Thomas J. Sweeney  
412.566.6968  
tsweeney@eckertseamans.com

June 30, 2004

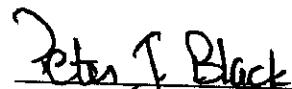
Honorable Rya W. Zobel  
U.S. District Court for the District of Massachusetts  
John Joseph Moakley U.S. Courthouse; 5th floor  
1 Courthouse Way  
Boston, MA 02210

Dear Judge Zobel:

This letter is being submitted on behalf of both parties in response to your request for a status report on settlement discussions as of today's date. We completed the depositions of Jennifer Harris (driver) and Catherine Harris (plaintiff) yesterday in Boston. Based on the information developed in these depositions, counsel for General Motors requires additional time to have the facts and technical issues examined by expert witnesses - most likely in the areas of biomechanics, injury causation, and restraint system design. Although Plaintiff's counsel has made a demand that he has indicated is negotiable, counsel for General Motors is not in a position to make a recommendation to his client concerning an appropriate value for this case for settlement purposes until this technical analysis has been completed. The parties suggest that a second status report be submitted to the Court in 90 days or at some time that suites the convenience of the Court.

  
\_\_\_\_\_  
Thomas J. Sweeney

Counsel for General Motors Corporation

  
\_\_\_\_\_  
Peter J. Black

*by*  
\_\_\_\_\_  
t/c authority 30 June 04  
Counsel for Catherine Harris

62 S 29 JUN 2004

PITTSBURGH, PA HARRISBURG, PA PHILADELPHIA, PA BOSTON, MA WASHINGTON, DC WILMINGTON, DE  
MORGANTOWN, WV SOUTHPOINTE, PA ALCOA CENTER, PA

MASS COURT

# ECKERT SEAMANS CHERIN & MELLOTT, LLC

One International Place  
18th Floor  
Boston, MA 02110  
Telephone: 617.342.6800  
Facsimile: 617.342.6899  
[www.escm.com](http://www.escm.com)

June 30, 2004

**Via Facsimile and Hand Delivery**

Lisa Urso, Clerk for the Honorable Rya Zobel  
United States District Court For the District of Massachusetts  
One Courthouse Way  
Boston, MA 02210

**RE: Catherine Harris v. General Motors Corporation  
United States District Court for the District of Massachusetts  
Civil Action No. 04-10007RWZ**

*Boston*

*Haddonfield, NJ*

*Harrisburg*

*Morgantown, WV*

*Philadelphia*

*Pittsburgh*

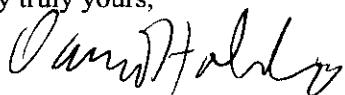
*Washington, D.C.*

Dear Ms. Urso:

Enclosed please find a copy of the joint status letter regarding settlement discussions in the above-referenced matter. An original will be delivered to the Courthouse forthwith.

Thank you for your attention in this matter.

Very truly yours,



David B. Hobbie

*BWE/mhm*  
*Enclosure*

*cc: Melissa Lightcap Cianfrini, Esq. (with enclosure)*  
*Peter Black, Esq. (with enclosure)*

2004 JUN 30 P 5:29  
ECKERT SEAMANS CHERIN & MELLOTT, LLC  
ATTORNEYS AT LAW

*(K0277447.1)*  
SOUTHERN DISTRICT OF MASS.  
David B. Hobbie, Esq.  
617-342-6826  
[dhobbie@eckertseamans.com](mailto:dhobbie@eckertseamans.com)